REMARKS

Claims 1-20 are pending in this case. Claims 12 and 25 are objected to as allegedly being in improper dependent form. Claims 1-6, 8-17, 19-21, 25-27 and 29-34 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by Applicant Admitted Prior Art ("APA"). Claims 7, 18, 22-24 and 28 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over APA in view of United States Patent No. 5,588,147 ("Neeman"). Applicants respectfully traverse the rejections.

Interview Summary

Applicants' undersigned representative, Mr. Eiferman, and Examiner Ehichioya participated in a telephonic interview on September 6, 2006 to discuss the above claim amendments. Examiner Ehichioya stated that the above claim amendments clarified the claimed subject matter.

Claim Objections

Claims 12 and 25 are objected to as allegedly being in improper dependent form. Claims 12 and 25 are hereby cancelled to advance prosecution of this application. Accordingly, withdrawal of the objections are respectfully requested.

Rejections under 35 U.S.C. § 102

Claims 1-6, 8-17, 19-21, 25-27 and 29-34 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by Applicant Admitted Prior Art ("APA"). Applicants respectfully disagree and traverse.

Independent claims 1, 13 and 26 each require (1) a master file that is stored at a client; and (2) a replica file that is stored at a server.

APA does not teach or suggest either (1) a master file that is stored at a client; or (2) a replica that is stored at a server. Fig. 2 (labeled as "Prior Art") clearly depicts a master file 215 stored at a server 210 and a replica 225 stored at a client 220.

The Office Action states that ¶ 0032 of the specification suggests replication from a master at a client to a replica at a server. The Office Action then cites only the first two sentences of ¶ 0032. However, the complete four sentences of ¶ 0032 are shown below:

At step 314b, changes are made to master 215. Such changes may originate directly from server 210. Alternatively, as set forth above, such changes may be replicated to server 210 from another connected client. For example, at another connected client, the third row of a replica may be deleted. This change may be then replicated back to master 215, resulting in the third row being deleted from master 215 at step 314b.

¶ 0032 as shown above does not teach or suggest replication from a *master* at a client to a *replica* at a server. Rather, ¶ 0032 is clearly referring to replication from a *replica* at a client to a *master* at a server. This is clearly confirmed by the last two sentences of ¶ 0032 (citing master 215 stored at server 210), which were not shown in the Office Action.

As stated in ¶ 0003 of the specification, the master "controls" operation of other files (*e.g.*, its replicas). This means, for example, as shown in steps 310 and 312 of Fig. 3, that, when changes from a master are replicated to a replica, the changes from the master are copied to the replica irrespective of any conflict resolution scheme. By contrast, as shown in steps 316 and 318 of Fig. 3, changes from a replica are replicated to a master in accordance with a conflict resolution scheme (*e.g.*, only if they do not conflict with other changes already made at the master). Thus, steps 316 and 318 of Fig. 3 cannot possibly be construed to represent replication from a master at a client to a replica at a server. Rather, steps 316 and 318 can only be construed to represent replication from a replica at a client to a master at a server.

Accordingly, Applicants respectfully submit that independent claims 1, 13 and 26 are not anticipated by APA. Applicants further submit that claims 2-4, 6, 8-11, 15-17, 19-21, 27 and 29-34 are patentable at least by reason of their dependency. Claims 5, 12, 14 and 25 are hereby cancelled. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 7, 18, 22-24 and 28 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over APA in view of United States Patent No. 5,588,147 ("Neeman"). Applicants respectfully disagree and submit that claims 7, 18, 22-24 and 28 are patentable at least by reason of their dependency. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

CONCLUSION

In view of the above amendments and remarks, Applicants respectfully submit that the present application is in condition for allowance. Applicants respectfully submit that no new matter is added in the above amendments. In view of the above amendments and remarks, Applicants respectfully request reconsideration of the present application.

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